

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

FILED IN CLERK'S OFFICE  
U.S.D.C. Atlanta

JUL 18 2011

JAMES L. ... Clerk  
By:  Deputy Clerk

KAREN-BRANDEE WILLIAMS,

Plaintiff,

Vs.

CIVIL ACTION

FILE NO. 1:11-CV-0512

WSD

CORINE DEYTON, in her official  
capacity as Mayor of Forest Park;

SPARKLE ADAMS, in her official  
capacity as Council Member and  
Mayor Pro Tem of Forest Park;

JOE WIMBERLY, in his official  
capacity as Chairman of the

Forest Park Board of Ethics; and

JOHN PARKER, in his official capacity as  
City Manager c/o CITY OF FOREST PARK)

Defendants.

**PLAINTIFF'S EMERGENCY MOTION TO REOPEN CASE  
AND FOR T.R.O AND/OR PRELIMINARY AND CONSOLIDATED  
PERMANENT INJUNCTION FROM REMOVAL OF OFFICE**

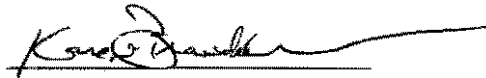
COMES NOW Plaintiff, Karen-Brandee Williams, pursuant to Fed. R. Civ. P.65, who respectfully moves this Court to enter preliminary and permanent injunctive relief enjoining any and further enforcement of Sections 2-1-56, 2-1-59, 2-1-60, 2-1-66, and 2-1-68 of Title 2, Chapter 1, Article E of the Code of Ordinances and Section 5.16 of the City Charter, Article V- Elections, and Removal of officers; of the City of Forest Park, Georgia [the "Challenged Ordinance"]and specifically enjoining the public hearing and final decision of the council presently scheduled for 6:00 PM on July 28, 2011.

Plaintiff also moves the court to take immediate action of the following:

- Re open this case [based upon Defendants own admission of complexity of issues]
- Reassign another Judge to review and make a ruling
- Demand the City of Forest Park and Council Members, to cease and desist their conspiracy and their vote to remove Plaintiff from office
- Enter preliminary and permanent injunctive relief enjoining any proceeding and punishment against her pursuant to Sections 2-1-56, 2-1-59, 2-1-60, 2-1-66, and 2-1-68 of Title 2, Chapter 1, Article E of the Code of Ordinances And including Section. 5.16. - Removal of officers of The Charter Article V. - Elections of the City of Forest Park, Georgia (the "Challenged Ordinances").

For the reasons set forth in the accompanying Brief, Plaintiff urges the Court to grant this motion for preliminary injunction and consolidate the preliminary injunction with a permanent injunction.

Respectfully submitted this 18 day of July 2011.



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Plaintiff

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**CERTIFICATE OF SERVICE**

I hereby certify that I have served the foregoing PLAINTIFF'S EMERGENCY MOTION TO REOPEN CASE AND FOR T.R.O AND/OR PRELIMINARY AND CONSOLIDATED PERMANENT INJUNCTION FROM REMOVAL OF OFFICE by mail through the United States Postal Service or attempt to provide notice via personal service or to the following non-CM/ECF participants:

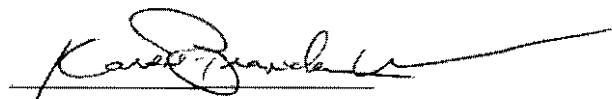
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